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**Attorney for Defendant:**  
**Southbridge Towers, Inc.**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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**IN RE: WORLD TRADE CENTER LOWER**  
**MANHATTAN DISASTER SITE LITIGATION**

-----X 21 MC 102(AKH)

**IVAN AYALA,**

**Plaintiff(s),**

**07CV1466 (AKH)**

**-against-**

**BFP ONE LIBERTY PLAZA CO., LLC., et al.**

**NOTICE OF ADOPTION OF**  
**ANSWER TO MASTER**  
**COMPLAINT**

**Defendant(s).**

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**PLEASE TAKE NOTICE** that Defendant, SOUTHBRIDGE TOWERS, INC.

(hereinafter referred to as "SOUTHBRIDGE TOWERS") by it's attorney, Frank A. Scanga, Esq., as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts it's Answer to the Master Complaint dated, filed and served October 3, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein.

**PLEASE TAKE FURTHER NOTICE** that defendant, SOUTHBRIDGE TOWERS,

reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross-claim against any and all co-defendants.

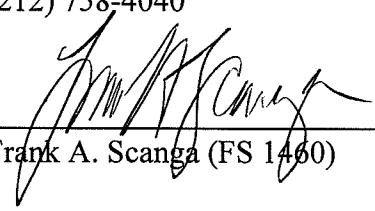
**PLEASE TAKE FURTHER NOTICE** that defendant, SOUTHBRIDGE TOWERS, also adopts all affirmative defenses and the jury demand herein.

**WHEREFORE**, the defendant, SOUTHBRIDGE TOWERS demands judgment dismissing the above-captioned actions as against it together with it's costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
October 3, 2007

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